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Board of Supervisors

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March 7, 2025

Comments on proposed NWFP amendment
R6 - Pacific Northwest Region All Units
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Portland, OR, 97208-3623
SENT VIA EMAIL

Subject: County of Siskiyou Comments on the Draft Environmental Impact Statement for the Northwest Forest Plan Amendment

To Whom it May Concern:

The Siskiyou County Board of Supervisors is submitting formal comments on the Forest Service’s Draft Environmental Impact Statement (DEIS) for the Northwest Forest Plan Amendment. As part of this Plan Amendment, the Forest Service should take every opportunity to improve the proactive management of our federal lands to address both the need for amending the Northwest Forest Plan (NWFP) and the issues brought forward during the comment period.

As noted in our initial letter, Siskiyou County is home to five National Forests: the Klamath, Shasta-Trinity, Modoc, Six Rivers, and Rogue-Siskiyou National Forests. Together, these five National Forests comprise 60% of our county’s land area. The management of these forests has a profound and direct impact on our local communities and residents. This is further underscored in the socioeconomic analysis of the NWFP region (DEIS, Table 3-17), where Siskiyou County is categorized as having an "Extremely High" dependence on federal forest lands and associated industries.

The County, along with much of the Western United States, continues to contend with increasing size and severity of catastrophic wildfires, which have devastated Northern California communities nearly every year. Drought conditions, coupled with the decline in thinning and other forest management maintenance practices, have resulted in overcrowded forests vulnerable to insect infestations, fire dominated landscape deforestation and hydrologic stream flow dysfunction. These factors contribute directly to the alarming escalation in both the frequency and severity of wildfires. In 2010, it was estimated that the Sierra forests contained an average of 400 trees per acre—far more than the 70 trees per acre present before the Gold Rush. Excessive tree density is a significant driver of wildfire intensity, and only seven percent of annual growth is currently removed through thinning and harvesting. The resulting catastrophic wildfires severely impact Siskiyou County's landscape, wildlife, water quality, economy, and communities. Furthermore, these fires necessitate over \$1 billion in taxpayer funds annually to combat, consuming more than 50% of the Forest Service’s budget. In addition, the cost of wildfire in Siskiyou County over the last six years has been hundreds of millions of dollars in fire

suppression, lost timber, and lost critical infrastructure.

The County's public land timber supply has experienced a drastic decline in recent decades and not met any targets as outlined on the NWFP, nor what is needed for economic stability. Between 1984 and 1988, Siskiyou County's average annual timber harvest was 538 million board feet, 50% of which came from federal lands. By contrast, between 2004 and 2008, following the federal listing of the Northern Spotted Owl as endangered in 1994, the annual timber harvest had dropped to an average of 208 million board feet, with only 18% derived from federal lands. In 1990, the County had 871 wood products manufacturing jobs across 14 facilities, with wood products accounting for 78% of local manufacturing employment. By 2008, that number had fallen to 355 jobs at seven facilities, with wood products now representing just 42% of manufacturing employment.

Our comments on the DEIS aim to improve the conditions of our forests, our residents, and our communities. Below are general comments aimed to address our biggest concerns and how to address them. Our further comments focus on each need identified in the DEIS, and providing specific feedback on how well the proposed alternatives address the unique challenges faced by Siskiyou County. In reviewing the DEIS, it is evident that no single alternative fully addresses our concerns. Instead, a hybrid approach—combining elements of Alternatives B and D—would offer the necessary flexibility to address the diverse needs of our National Forests.

General Comments on the DEIS:

It is important to recognize that while the draft amendment proposes improvements in forest management, there are key issues that must be addressed for it to be effective. These concerns include:

Survey & Manage Standards: The Survey & Manage standards, originally designed to protect over 300 species dependent on late successional forests, are now outdated. With the expansion of the Late Successional Reserve (LSR) network and the proposal to manage an additional 1.3 million acres of mature forests like LSR, these standards limit active forest management, especially in fire-prone areas. Adhering to these standards prevents necessary thinning and fuel reduction, which exacerbates fire risks. These standards should be removed to allow more proactive forest management.

Timber Production: The amendment further limits the amount of land designated for timber production. Specifically, it reduces the Moist Matrix land base by transitioning over 1.3 million acres of "moist mature and old growth" forests into quasi-LSRs. These areas were previously designated for timber production but would now be managed similarly to LSRs, restricting the potential for harvesting. The amendment must clarify that timber production remains the primary focus for Young Moist Matrix stands to maintain a sustainable timber supply and economic benefits.

Dry Forest Management: The proposed changes to Dry Forest management may inhibit long-term timber production. The amendment's desired conditions call for the presence of large, old trees and the absence of small, young trees in the surrounding areas. This approach, which focuses on maintaining large trees and conducting periodic controlled burns, is intended to reduce hazardous fuel loads. However, this strategy could limit the ability of these forests to provide a sustainable timber supply, as it may prevent regeneration of younger trees, which are necessary for future harvests.

Sustained Yield: The amendment proposes modifications that reduce the available land base for timber production to approximately 5% of the National Forest System (NFS) lands. While the amendment includes provisions for thinning and forest health management, it decreases the acreage designated for timber harvest, particularly in moist forests. To offset this loss, the Forest Service should consider redesignating parts of the existing LSR as Matrix lands, which would make them available for sustainable timber production.

Adaptive Management Areas (AMAs): The original intent for AMAs was to test new forest management techniques, but this goal has not been fully realized. The amendment should transition AMAs to the Matrix land use allocation (LUA) for timber production, which would help offset the loss of lands available for timber harvest due to the transition of lands to quasi-LSR status.

Timber Salvage: The proposed amendment prohibits any timber salvage in LSRs following natural disasters, such as wildfires. Salvaging timber after such events is a critical tool for accelerating recovery of forests, especially in fire-prone areas. Salvage operations help mitigate climate change by preventing the carbon stored in dead trees from being released into the atmosphere. The Forest Service should reconsider this prohibition and allow salvage operations as part of post-fire recovery efforts.

Wildfire Management: The amendment includes provisions for “unplanned” ignitions to achieve desired forest conditions, which is highly concerning. While prescribed fire is an effective tool for hazardous fuel reduction, unplanned ignitions during the fire season can pose serious risks to communities and public health. The Forest Service should adopt a policy that prioritizes aggressive wildfire suppression during the fire season, regardless of land use allocations, to protect local residents and infrastructure.

Timber Revenue and County Services: The amendment increases the number of acres treated but decreases the timber volume per acre, which may diminish the economic value of timber harvests. This is particularly concerning for rural counties, where timber revenue is essential for funding public services. The Forest Service must reassess the assumptions and calculations behind these changes to ensure that the amendment supports a sustainable timber supply that benefits local economies.

While the amendment to the Northwest Forest Plan aims to improve forest management, it does not go far enough in addressing outdated barriers to active forest management and wildfire prevention. The Forest Service should make adjustments to the plan to allow for more proactive management, particularly in fire-prone areas, and to maintain a sustainable timber supply that supports both the environment and local communities.

Need to Amend the NWFP:

The preliminary need to amend the NWFP described in the Notice of Intent focused on five interrelated topic areas. Below are comments on needs 1, 2, 3 and 5.

(Number 1) Improving wildfire resistance and resilience across the NWFP area:

The five-year average for wildfire acres burned in Siskiyou County stands at 1.7 million acres, with a staggering 2.5 million acres consumed by fire in 2022 alone. This level of wildfire activity is unsustainable, with forest resources being lost at an alarming rate. In many instances, areas

previously burned are subjected to additional fires, as large amounts of standing and downed fuel from prior fires remain, exacerbating the situation.

The financial toll of wildfires in Siskiyou County is another critical concern. The County has meticulously tracked expenses incurred during wildfire events, including, but not limited to, costs for evacuations, loss of housing, post-fire cleanup of entire neighborhoods, insurance claims, the strain on law enforcement and county services during fires, damage to County roads both during and after fires, and long-term recovery expenses. Over the past six years, the cost of wildfires in Siskiyou County has reached hundreds of millions of dollars, including fire suppression efforts, lost timber revenue, and critical infrastructure damage. These economic impacts must be reflected in the need for fire-resilient forests and incorporated into the discussion on the sustainability of regional communities (DEIS, 3.8 Issue 7 – Sustainability of Regional Communities).

Wildfire seasons are not only growing longer but are becoming progressively more destructive. Over the last six years, wildfires in Siskiyou County have consumed 1.1 million acres, destroyed more than 1,000 homes and structures, and tragically claimed 10 lives. While the environmental and wildlife impacts, as well as the loss of human life, are immeasurable, they significantly affect our communities, economy, and the functioning of our rural county government. Furthermore, the health consequences of wildfire smoke are severe; during the summer of 2020, Siskiyou County experienced an Air Quality Index (AQI) consistently exceeding 400, peaking at over 500. The air quality during this time was equivalent to smoking ten cigarettes a day, resulting in widespread health issues for residents during extremely unhealthy air quality days from July to October.

Access to and on Forest Service roads is crucial for wildfire suppression, yet these roads are frequently closed, inadequately maintained or scheduled for decommissioning. Often, this is due to budget constraints and the threat of lawsuits from activist groups not residing in our county.

The current management of federal lands, particularly concerning forest protection and fuels reduction in National Forests, is inadequate, has long been neglected, and is significantly underfunded. This leaves Siskiyou County and its residents in substantial peril, heightening the risk of catastrophic wildfires. Many of the areas burned in recent fires were included in proposed projects by the United States Forest Service but were stalled or blocked by "environmental" appeals and lawsuits. In response to this pressing issue, the Board of Supervisors adopted Resolution 24-156 in September 2024. This resolution urges the Forest Service to 1) "actively manage federal lands to be resilient to wildfire through prescribed burns, forest thinning, timber harvesting, and fuel removal," and 2) "open, maintain, and regularly service Forest Service roads to support forest management and wildfire suppression activities."

Resolution 24-156 directly reflects Issue 1, and it is imperative that the Forest Service align its budgets to prioritize these needs and mitigate the severe risks to our citizens.

(Number 3) Improving conservation and recruitment of mature and old-growth forest conditions, ensuring adequate habitat for species dependent upon mature and old-growth ecosystems and supporting regional biodiversity:

To address the conservation and recruitment of mature and old-growth forest conditions it is important to improve wildfire resistance and resilience. Recent information from the Forest Service on Mature and Old Growth forests indicates that there has been a loss of 5.5 million

acres of Mature and Old Growth Forest with the greatest majority of this being lost to wildfire (3.3 million acres), insect and disease.

In the Supplemental Report to the Bioregional Assessment of Northwest Forests one of the key findings was that sixty-five (65%) percent of lands in the NWFP area (17.8 million acres) lacks historical structural diversity and resilience. These areas may be also part of mature and old growth areas. The number one threat from fire in potential old growth forests is lack of forest maintenance activities. Both prescribed fire and thinning protects potential dominate tree classes while exclusion of both activities continues to place all potential old growth stands at risk of catastrophic loss. Many of these untreated acres affect Siskiyou County in terms of elevated risk of fire, impacts to the community from the inability to restore forests for both structural diversity and resilience as well as community safety.

The combination of increased wildfire and the inability to adequately restore the forest structure and composition to reflect expected fire activity and climate change can better be attained through the flexibility of Alternative D. Alternative D (DEIS p. 3-66) provides for a forest that maintains habitat reflective of historic conditions within the inherent capability of the landscape given both the fire activity and climate change.

(Number 4) Incorporating Indigenous Knowledge into planning, project design, and implementation to achieve forest management goals and meet the agency's general trust responsibilities:

Siskiyou County fulfills its trust responsibilities and the National Forests within Siskiyou County work closely with tribes on a multitude of projects. Moving forward, it is important to develop comprehensive approaches that look at “all lands” in the planning, project design, and implementation since many forests have checkerboard ownership with private timberlands as well. In looking at project effectiveness involving activities aimed at meeting this goal, the Forest Service must include pace and scale measurement of the activity and its feasibility to change the current trajectory of this downward spiral of forest resiliency.

(Number 5) Providing a predictable supply of timber and non-timber products and other economic opportunities to support the long-term sustainability of communities located proximate to NFS lands and economically connected to forest resources:

Impacts of the NWFP have been keenly felt throughout Siskiyou County. Many communities continue to struggle to provide needed services, maintain viable populations, and attract new residents, and have never rebounded from the 1993 NWFP. Recreational expectations that were identified in the NWFP were not realized in rural communities and predicted timber supplies have fallen which has reduced the overall workforce and infrastructure. At this time, it is important to focus on rebuilding that workforce with a skilled workforce that is ready to take on the challenges identified in the Amendment, including appropriate wildfire-risk mitigation, restoring forest and fire resilience, and protecting communities throughout the County. The amount of small diameter timber that could be removed from the surrounding forests could provide options for various business and enterprises. However, without a reliable timber supply many businesses can't make necessary equipment investments to succeed. Both alternatives B and D begin to address this need, but portions of each alternative have different strengths that are highlighted in the issue discussion below.

On March 1, 2025, President Trump issued an Executive Order, calling to the Immediate Expansion of American Timber Production. This Executive Order emphasizes the importance of timber production for the United States' economic security and national well-being. It highlights the need to overcome federal policies that have hindered the full utilization of the nation's timber resources, leading to reliance on foreign imports, job losses, higher construction and energy costs, and increased wildfire risks. The order directs federal agencies, primarily the Forest Service, to enhance timber production and forest management practices to boost domestic supply, reduce regulatory delays, and streamline the permitting process. It also mandates coordination between the Secretary of the Interior and the Secretary of Agriculture to issue updated guidance, propose legislative changes, and set annual timber production targets.

President Trump's Executive Order must be thoroughly integrated into this EIS and the NWFP Amendment. As emphasized repeatedly throughout our comment letter, the NWFP serves as the cornerstone for federal forest management across much of the western United States. This Executive Order outlines the crucial steps needed to address the shortcomings of the original NWFP, which have directly contributed to the challenges our forests and economies face today. It is imperative that these actions are fully implemented to restore balance and ensure sustainable, long-term solutions for both our environment, the economy, and our rural communities.

DEIS Issues:

Issue 1 –Incorporation of Indigenous Knowledge and Increase Tribal Engagement:

To what degree would the proposed alternatives incorporate tribal engagement and consideration of Indigenous Knowledge into planning, designing, and implementing forest management practices?

In reviewing the proposed alternatives to incorporate tribal engagement, Siskiyou County is supportive of Alternative D. Alternative D responds to comments for more active and adaptive forest stewardship practices. While it includes additional goals and a Primitive Management Area (PMA) emphasizing integration of Indigenous Knowledge and co-stewardship, Alternative D also reduces two Tribal-Forest Stewardship Objectives under Alternative B to Goals, thereby eliminating measurable outcomes for collaborative restoration projects of significance to Tribes. These changes may be more conducive to the inclusion of a larger number of Tribes and a diversity of tribal projects implemented at a smaller scale. The County recognizes that each Tribe has different capacity and priorities. For meaningful engagement and consideration, the Forest Service is continuing to build trust and putting a number on how many projects may not be as meaningful as working together on a project from planning through to implementation.

Issue 2 – Forest Stewardship:

To what degree would the proposed alternatives provide for a holistic and balanced approach of managing for mature and old-growth ecosystems while providing a predictable supply of timber and non-timber products?

The DEIS (p.3-15) provides guidance on how moist and dry forests are identified. Project planning teams should distinguish between moist forests and associated ecosystems and dry forests and associated ecosystems at the stand scale in an interdisciplinary manner, using one or more of the following approaches:

- Identifying stand-scale plant associations using existing keys where available.

- Coordinating and conferring with relevant scientists and interested Tribes to characterize plant communities as dry and moist based on best available scientific information, including Indigenous Knowledge, and land management history.
- Mapping environmental variables (e.g., climate water deficit, soils, slope aspect and topography) that are reliably indicative of differences in inherent productivity and response to disturbance.
- Mapping overstory tree composition characteristics that are reliably indicative of differences in inherent productivity and response to disturbance (e.g., dominance by ponderosa pine). (FORSTW-ALL-GDL-01)

Our concern is that without clear examples and sideboards, this process at the stand level will be extremely time consuming and cumbersome with the potential for great conflict with various public groups, Tribes, and other entities. Since the focus has been to treat at a landscape scale, there are many areas that will clearly fall into either the dry or the moist forest, but it is the areas that have mixed vegetation or other environmental variables that indicate stands in a transition between dry and moist. There will be a gradient across the landscape that needs to be considered to have this as a helpful tool. Additionally, many common stand exams have limited precise data on stand or tree age, and in many cases tree size and other environmental indicators are used as proxy to determine stand age.

Siskiyou County supports Alternative B for dry forests, which includes a standard that states: “Vegetation management and harvest should retain all trees older than 150 years. Exceptions apply for tribal cultural use, restoration of unique ecosystems, and to reduce wildfire risks to communities and infrastructure. See also FIRE-ALL-DC-01 and FIRE-ALL-PMA” (FORSTW-ALL-DRY-STD-01-B). This standard would apply to around 835,000 acres of stands in dry forest Late Successional Reserves (LSR). However, the standard would not prevent treatments in these stands, and would provide for conservation of individual older trees. A subset of these acres would also be in Riparian Reserves (RR) with additional needs to meet Aquatic Conservation Strategy (ACS) objectives.

Siskiyou County recommends including portions of Alternative D (DEIS, p-3-30) which includes desired conditions specific to dry forest LSRs related to northern spotted owl habitat. However, Alternative D sets the desired level to be **reflective of a range of historic conditions within the inherent capability of the landscape, given expected fire activity and other effects of climate change.**

Effects on late-successional and old-growth in dry forests in Matrix:

Siskiyou County supports Alternative B as stated in the DEIS (p.3-31) In Alternatives B and C, for dry forest Matrix, the same standard as for LSR would apply, providing conservation of trees older than 150 years old with some exceptions (FORSTW-ALL DRY-STD-01-B and C). There are approximately 748,000 acres of dry forests in Matrix and Adaptive Management Areas (AMA), including RRs, for which these additional old tree conservation measures would apply under Alternatives B and C (Table 3-6). These protections were absent in the 1994 NWFP. Treatments would be encouraged in these stands but trees older than 150 years would be retained.

The DEIS documents (p. 3-61) that the AMA’s were “expected to function as experimental areas to address unresolved questions but that was never fully instituted under the 1994 NWFP.” How

will the AMAs be used under the amendment? AMAs should be placed in the Land Use Allocation (LUA) Matrix.

The DEIS includes information on salvage management (DEIS p. 3-31). Alternative D prohibits salvage harvest in stands older than 120 years old, with exceptions for tribal co-stewardship and cultural use, removing hazard and danger trees, or reducing wildfire risk to communities. The County supports this with the addition that salvage harvest alongside roads for safe ingress and egress should be permitted regardless of age or LUA. The hazard tree guidelines allow for trees to be removed for safety and if the trees are decked or removed it should be permissible to sell the trees if there is any commercial value remaining. Selling of timber that has to be removed for public safety should not be penalized and left in decks or on the ground.

Change in Timber Outputs:

The County supports both Alternatives B and D to increase forest treatment acres above current harvest levels, (Table 3-7). For moist forests, we recommend Alternative D as stated in table 3-7 within 10 years of amendment approval, treat 20% of young stands (130,000 to 163,000 acres/decade) in moist forest Matrix lands across the NWFP area, not including any additional acres of salvage treatments that may occur, by using ecological forestry methods for forest management while also conserving and retaining older trees and achieving desired conditions for multiple resources. We recognize the programmatic nature of the document and specific timber outputs will vary across the NWFP area. Our intent is to recommend alternatives that provide the greatest flexibility for our local forests to develop proposed actions and implement projects that provide fire resistance and resiliency using ecological forestry methods.

For dry forests we recommend Alternative B, which outlines that within 15 years of amendment approval, the Forest Service will implement treatments that contribute to ecological resilience on at least one third of dry forests (527,000 to 643,000 acres/decade or 790,000 to 964,000 acres/15 years) across the NWFP area, This does not include any additional acres of salvage treatments that may occur, by using ecological forestry methods for forest management while conserving and retaining older trees and promoting the development of future functional old-growth forest ecosystems appropriate for dry forests. We recognize the DEIS is a programmatic document and the numbers reflect the entire NWFP area. However, within Siskiyou County we are losing dry and moist forests at an alarming rate. By having the flexibility to treat areas in need of treatment, the Forest Service will achieve the necessary fire resistance and fire resilience in our forests and communities.

Forest Stewardship approach:

Many areas within our forests have younger, dense stands that evolved over the past 60-years. This over densification has resulted in increased habitat that is not sustainable over time. Accurate assessment tools can help the Forest Service with stakeholders to address these issues in a more meaningful way.

Issue 3: Fire Resistance and Resilience:

What effects would the proposed alternatives have on the wildfire resistance and resilience of ecosystems within the NWFP area?

Siskiyou County supports Alternative D to increase fire resistance and resilience. This includes treating 4.9 million acres per decade, employing all fuels treatments across all LUAs. Treatments would include:

- 900,000 acres per decade in and adjacent to community protection areas (1 mile buffer Housing Unit Density (HUD)).
- 2.7 million acres per decade treated with wildland fire (prescribed, unplanned ignition, and cultural) to meet resource objectives in all LUAs, including LSR.
- Implement reforestation and associated treatments on 100,000 acres across all LUAs during the first decade following plan approval, and 125,000 acres during the second decade.

Implementing Alternative D would be expected to improve wildland fuel conditions over the existing conditions. This in turn would be expected to increase fire resistance and ecosystem resilience, resulting in reduced risk of wildfire to communities. This alternative best meets County needs to ensure fire resilient communities for residents.

Issue 4: Biological Resources:

What effects would the proposed alternatives have on biological resources within the NWFP area?

In the DEIS, the forests within Siskiyou County are described in the Klamath, California physiographic province as being “dominated by mixed-conifer and mixed-conifer/hardwood forests. Extensive lands managed by the Forest Service occur in this province. Similar to the OR Klamath province, forests are highly fragmented by natural factors such as poor soils, dry climate, and wildland fires, as well as human-induced factors including timber harvesting and roads and many forest stands that were logged in the early 1900s now contain a mixture of old trees left after harvest and younger trees that regenerated after harvest. In addition to a large number of endemic plant species, this province is host to a diversity of narrowly endemic mollusks and salamanders”.

Due to the great diversity of wildlife species, and the programmatic level of this effort, this DEIS does not assess the potential effects of the proposed amendment on general wildlife and plant species including Regions 5 and 6 Management Indicator Species. Site-specific effects analysis to general wildlife and plants would continue to be assessed during project-level NEPA analysis and ongoing forest plan monitoring. The DEIS analysis focuses on broad scale potential effects to special status wildlife and plant species including Regional Forester’s Sensitive Species (RFSS), Survey and Manage species, and federally listed species.

Findings by Forest Service biologists indicate in recent years, large, high-severity wildland fires have resulted in losses of mature and old-growth forests, eliminating gains achieved in the first 25 years of implementation of the 1994 NWFP. Research indicates that large wildland fires that impact mature and old-growth forests will increase in frequency and extent within the NWFP area (Halofsky et al. 2020, Halofsky et al. 2018). Given this dire prediction, it is important that fire resistant and resilient strategies are allowed to move forward to provide current and future habitat. By not treating forest stands, the likelihood of greater loss of mature and old-growth forests increases. We strongly encourage that during the Biological Assessments being prepared for the proposed amendment the analysis will include the benefit of fire resistance and resilient treatments in the ESA consultation with the United States Fish and Wildlife Service (USFWS)

and the National Marine Fisheries Service (NMFS). Similarly, this should also be included in the final Biological Evaluation (BE) and summarized in the Final EIS.

Issue 5: Climate Change:

What effects would climate change have on the NWFP area and the resulting management needs in the area? What effects would the proposed alternatives have on climate change?

Alternatives B and D would result in increases in the amounts of stewardship and fuel reduction treatments, which would contribute to increased capacity of the landscape to weather events, under both alternatives compared to the No Action Alternative.

Issue 6: Air Quality:

What effects would the proposed alternatives have on the air quality within the NWFP area?

Siskiyou County supports Alternative D which proposes to treat 900,000 acres per decade in and adjacent to community protection areas (1-mile buffers around HUDs), in addition to current and historic fuels management of 4.95 million acres per decade employing all fuel treatments across all LUAs. As such, Alternative D offers the greatest probability of decreasing wildfire smoke, which would have the greatest benefit to public health in the County.

Issue 7: Sustainability of Regional Communities:

To what degree would the proposed alternatives affect the long-term sustainability of regional communities, with an emphasis on those communities that are culturally and economically connected to forest resources?

Siskiyou County falls within the **extremely high** category meaning both federal forest lands and industry employment are extremely important.

Improving Opportunities for Jobs Supported in Local Communities:

The three action alternatives help to set goals that target training, restoration treatments, and a myriad of other tools to support local communities. Siskiyou County requests more specifics beyond goal statements where the local communities do receive training and job support.

Forest Products:

All action alternatives will have higher timber production than Alternative A. With higher timber production there will be more opportunities for more jobs in both forestry and restoration forestry where no commercial timber is produced. Restoration forestry can continue as long as there are grant sources to help fund this work, otherwise the use of stewardship timber sales can be used if an attractive mix of products are included. Our concern is the type of material produced, generally smaller size timber, and biomass. Current local facilities do not have the capacity for this material and with every timber sale it is a challenge to find the appropriate mix of timber and sizes to provide even small profits for industry. More emphasis on helping develop local industries to handle forest products is essential. The DEIS does not go far enough to linking timber produced to mills, biomass facilities, and other energy producing businesses that would

help with the sustainability of the communities in Siskiyou County. This must be recognized and addressed.

Federal Land Payments:

We support the Secure Rural Schools and Community Self-determination Act, especially after the timber industry declined in the 1990's and timber receipts dramatically decreased. Both Alternatives B and D would help to provide necessary funds. We realize these funds are renewed annually by Congress and this can cause uncertainty in the flow of funding. Siskiyou County utilize these needed funds and they do contribute to valuable work and providing jobs for youth as well as local contractors throughout the County.

Recreation:

Recreation is very important to Siskiyou County and fires that have closed National Forests have greatly impacted Forest Service Recreation Enhancement Act funds. Often times entire forests are closed if wildfire occurs, even if the risk may be low at a campground or other recreation area. We recommend judicious use of closures and support action alternatives that promote better forest health and resilience and reduce the risk of wildland fire affecting highly valued recreation resources.

Fire Resistance and Resilience:

The DEIS discusses fire resistance and resilience in (DEIS p. 3-153) terms of wildfire impacts on communities in wildland urban interface. Wildfires create public health and safety concerns, and community economics by affecting air and water quality, power supplies, recreation opportunities, property and critical infrastructure, and travel and transportation. Alternative D encourages additional fuels treatment acres in areas that are at a high risk of wildland fire to people, property, and infrastructure. This alternative would exempt a 0.25-mile buffer around identified HUD areas from the S&M direction to conduct pre-disturbance surveys and the associated management requirements. S&M direction regarding the management of known sites would still apply within these areas. Like the Proposed Action, Alternative D would be expected to improve wildland fuel conditions over existing conditions within the NWFP area, resulting in a reduced risk from fires to highly valued resources, safer communities, and more effective wildland fire suppression by local resources.

Siskiyou County supports increased fire resistance and resilience and establishment of CPA. However, it is not clear how community protection areas would be delineated and how they are similar or different to Community Wildfire Preparedness Plans or other existing tools that help identify and prioritize meaningful fuels treatment adjacent to areas identified? More clarity is necessary on community protection areas.

Throughout the DEIS there is reference to critical infrastructure. For powerlines that crisscross National Forests, would the direction from the North America Electrical Reliability Corporation (NERC) which provides standards for powerline and critical infrastructure maintenance be adhered to? NERC has a wildfire mitigation reference guide that addresses treatments to mitigate wildfires adjacent to powerlines and measures to take before, during, and after wildfires. For powerlines that are not solely in matrix does the DEIS allow for necessary infrastructure treatments to occur regardless of LUA? Can these measures that would include vegetation management and timber removal along critical infrastructure be incorporated in the DEIS?

The Forest Transportation System provides a network of roads at different road maintenance levels. Many maintenance level 2, 3,4, and 5 roads provide access for emergency responders, access to communities, cell towers, fire lookouts, recreation sites, and a myriad of other uses. To increase fire resistance and resilience, the use of and maintenance of key arterial and collector roads is recommended. Each forest should map out critical ingress and egress routes that would provide access for emergency responders as well as access to campgrounds and other facilities. These roads can be used to establish a network of fuel breaks to ensure safe access by all users and be part of Potential Management Approaches (DEIS 2-7). Additionally, it is important to provide for routine maintenance of forest service roads to reduce impacts to water quality and ensure reliable access for both recreation and emergency responders. A fire resistant and resilient forest relies on an efficient and well-maintained transportation network.

In conclusion, the Northwest Forest Plan Amendment offers a critical opportunity to improve forest management practices that directly impact our forest conditions, communities and local economy. However, the current draft does not fully address the unique challenges our county faces, particularly with respect to wildfire prevention, sustainable timber production, and proactive forest management. We urge the Forest Service to carefully consider these comments and make the necessary adjustments to the Draft EIS to ensure that the amended plan effectively supports Siskiyou County's forests, residents, and future generations. Thank you for the opportunity to provide feedback, and we look forward to continued collaboration on this important issue.

Sincerely,

Signed by:


Nancy Ogren

Chair, Board of Supervisors

cc: Rural County Representative of California (RCRC)
California State Association of Counties (CSAC)
Congressman Doug LaMalfa
Supervisor Chris Christofferson, Klamath National Forest
Supervisor Ted McArthur, Six Rivers National Forest
Supervisor Rachel Birkey, Shastra Trinity National Forest
Supervisor Chris Bielecki, Modoc National Forest